

Hon. Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KURT A. BENSHOOF,

Plaintiff,

vs.

MOSHE ADMON, DANIEL AUDERER,
JUSTIN BOOKER, FREYA BRIER, CITY OF
SEATTLE, NATHAN CLIBER, ZACHARY
COOK, BENJAMIN COOMER, ANITA
CRAWFORD-WILLIS, JENNY DURKAN,
JAMES ERVIN, DAVID ESTUDILLO,
MARSHAL FERGUSON, MICHAEL FOX,
COREY FOY, AMY FRANKLIN-BIHARY,
WILLIAM GATES, III, STEVEN GONZALEZ,
TYLER GOSLIN, WILLIE GREGORY, OWEN
HERMSEN, JAY INSLEE, DAVID KEENAN,
GABRIEL LADD, DANIEL LENTZ,
MAGALIE LERMAN, MARY LYNCH,
SARAH MACDONALD, ANTHONY
MARINELLA, RICARDO MARTINEZ,
BRADLEY MOORE, KATRINA OUTLAND,
JESSICA OWEN, PCC NATURAL MARKETS,
KYLE REKOFKE, STEVEN ROSEN, BLAIR
RUSS, UMAIR SHAH, SPROUTS FARMERS
MARKET, MICHAEL THURSTON, JARED
WALLACE, SANDRA WIDLAN,

Defendants.

No. 2:23-CV-1392-JNW

DECLARATION OF DALLAS LEPIERRE

DECLARATION OF DALLAS LEPIERRE - 1
(2:23-cv-1392-JNW)

Ann Davison
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200

1 I, DALLAS LEPIERRE, being familiar with the facts set forth herein based on my personal
2 knowledge, and being competent to testify, hereby declare under penalty of perjury that the
3 following is true and correct:

- 4 1. During the course of this litigation, I spoke with Plaintiff, Kurt A. Benshoof, over the phone
5 multiple times.
- 6 2. I offered to waive service on behalf of the City's clients multiple times.
- 7 3. Plaintiff refused all such offers to waive service.

8 I declare under penalty of perjury that the foregoing is true and correct.
9

10 DATED this 4th day of October, 2024.

11
12 By: /s/Dallas LePierre
13 Dallas LePierre, WSBA# 47391
14 Assistant City Attorney
15 E-mail: Dallas.LePierre@seattle.gov

16
17 Seattle City Attorney's Office
18 701 Fifth Avenue, Suite 2050
19 Seattle, WA 98104
20 Phone: (206) 684-8200

21
22 *Attorney for Defendant City of Seattle, Jenny Durkan, Matthew*
23 *Lentz, Katrina Outland, David Sullivan, Gabriel Ladd, Jordan*
Wallace, Mary Lynch, Willie Gregory, Faye Chess, Jerome
Roache, Adam Eisenberg, Anita Crawford-Willis, Soheila
Sarrafan, Ann Davison, and Benjamin Coomer

CERTIFICATE OF SERVICE

I certify that on the 4th day of October, 2024, I caused a true and correct copy of this document to be served on the following in the manner indicated below:

King County Correctional Facility Kurt Alden Benshoof B/A number 2024-008067 500 Fifth Ave. Seattle, WA 98104 <i>[Pro Se Plaintiff]</i>	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: kurtbenshoof@gmail.com
Briana D. Gage 1716 North 128 th Street Seattle, WA 98133 <i>[Pro Se Plaintiff]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: bgage025@gmail.com
Michael C. Tracy and Sarah N. Turner Gordon Rees Scully 701 Fifth Avenue, Suite 2100 Seattle, WA 98104 (206) 659-5135 <i>[Nathan Cliber]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: mtracy@grsm.com
Amy Franklin-Bihary 701 Fifth Avenue, Suite 4550 Seattle, WA 98104 (206) 624-4900 <i>[Pro Se Defendant]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: afb@wechslerbecker.com
Darren A. Feider & Matthew Coughlan Sebris Busto James 15375 SE 30 th Place, Suite 310 Bellevue, WA 98007 (425) 454-4233 <i>[Puget Consumers Co-op, Freya Brier, Zachary Cook, Central Co-op]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: dfeider@sbj.law , mcoughlan@sbj.law

DECLARATION OF DALLAS LEPIERRE - 3
 (2:23-cv-1392-JNW)

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1 2 3 4 5	James T. Yand & James Johnson Miller Nash LLP 605 Fifth Avenue S, Suite 900 Seattle, WA 98104 (206) 622-8484 <i>[Big 5 Sporting Goods & Sprouts Farmers Market]</i>	() U.S. Mail (X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: james.yand@millernash.com , james.johnson@millernash.com cara.lowrance@millernash.com
6 7 8 9	Peggy Wu King County Prosecuting Attorney's Office 701 5th Avenue, Suite 600 Seattle, WA 98104 (206) 477-1120 <i>[King County and Judge David Keenan]</i>	() U.S. Mail (X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: pwu@kingcounty.gov
10 11 12 13 14	Sarah S. Mack Pacific Law Group LLP 1191 Second Avenue, Suite 2000 Seattle, WA 98101 (206) 245-1700 <i>[Seattle Public Schools, Gregory Narver, and Justin Booker]</i>	(X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: sarah.mack@pacificlawgroup.com
15 16 17 18	Blair M. Russ Tomlinson Bomsztyk Russ 1000 Second Avenue, Suite 3660 Seattle, WA 98104 (206) 621-1871 <i>[Blair M. Russ]</i>	(X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: bmr@tbr-law.com

/s/ Grace Selsor
Grace Selsor, Legal Assistant